

FILED

APR 02 2021

IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF OKLAHOMACARMELITA REEDER SHINN, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY MH, DEPUTYLOI HUYNH,
Plaintiff,

-against-

SHELTER MUTUAL INSURANCE COMPANY,
Defendant.

Case No. CIV-21-267-G

Hon. Charles Barnes Goodwin

(JURY TRIAL DEMANDED)

PLAINTIFF'S MOTION FOR ACCESS
AND PERMISSION TO FILE THROUGH CM/ECF

This notice is to inform the Court that, as a Plaintiff proceeding *pro se* and acting as his own attorney, I hereby request access and permission to file all pleadings, motions, and all other document typically filed through CM/ECF, as granted to any other attorneys. In support of this and the below requests, I cite the 14th Amendment's Due Process Clause, a substantial part of which is fair and equal access to justice, regardless of a litigant's status of representation.

It is incontrovertible and indisputable that there are real and tangible advantages and conveniences to being permitted to file electronically. Any privileges and rights afforded to any attorney should be afforded to *pro se* litigants acting as their own attorney.

While the Defendant's attorney may sit in the comfort of his office, sipping his coffee, and electronically file all paperwork and receive confirmation at the click of a button, a *pro se* Plaintiff like myself is deprived of the convenience and peace of mind that the documents are filed properly because my own motions and pleadings must traverse for days before reaching its destination, encountering risks and dangers such as being lost, misdelivered, or tampered with in the process. That is inherently unfair to

me, and accordingly, I submit my request that I be granted the same rights and privileges as my opponent's attorneys with regards access to the Court's CM/ECF system. In addition, or alternatively if the first request is not possible, allow me ability to exchange and submit all court documents related to this action via Email for the Court Clerk to file as appropriate.

I also take the opportunity in this Motion to humbly request that, with regards to any other rights, privileges, and conveniences afforded to my opponent's attorneys, including those I am not aware of and have not made explicit requests for due to my naivety, that the Court act on its own account and grant me those same rights, privileges, and conveniences so that both sides have some semblance of parity.

Sincerely,

s/ Loi Huynh, Plaintiff

3605 N. Battle Creek Dr.

Broken Arrow, OK 74012

Telephone: (918) 933-8989

Email: HuynhVShelter@gmail.com

(Please return a filed copy to Plaintiff)

CERTIFICATE OF SERVICE

I hereby certify that on March 31, 2021, a true and correct copy of the above document was transmitted via Email to the Defendant's attorney on record as follows:

Rodney D. Stewart

Email: rds@rstewartlaw.com

Sincerely,

s/ Loi Huynh, Plaintiff